

# **EXHIBIT A**

## Will Routt

---

**From:** Will Routt  
**Sent:** Saturday, December 29, 2018 1:50 PM  
**To:** Frank Watson; Horton, Odell  
**Cc:** Craddock, Bob; Trammell, Brad; MMcLaren@blackmclaw.com; Petronio, Beth W.; Whitwell, Lee; btimmons@blackmclaw.com; wcochran@blackmclaw.com; Bill Burns; Floyd, Amber; Brown, Byron; Cox, Meghan  
**Subject:** RE: Draft PARTIES' JOINT MOTION AND MEMORANDUM REQUESTING APPROVAL OF THE PROPOSED PROTECTIVE ORDER  
**Attachments:** Proposed ESI Protocol Search Terms.pdf; DISCO\_incomingProductionStandardFormats.pdf

Odell-

Plaintiffs' proposed ESI protocol is as follows. As discussed, the County has agreed, based on the court's anticipated ruling, to run search terms across the electronic documents of certain custodians during a limited time frame – we propose October 1, 2016 to June 30, 2017 – and to produce all of the results (excluding privileged items, if any). To that end, we've attached a list of proposed search terms and included a proposed custodian list below. The custodian list is made up of individuals who are parties to the lawsuit, were identified in the parties' written discovery, or who appear to have been involved in the Odyssey implementation based on Tyler's email production. I've also attached the technical specs that we need the County to follow for our ESI vendor to properly process the production.

We are happy to discuss on Monday.

Will

### Custodian List:

Bill Anderson  
Sharon Baker  
Gortria Banks  
Undrea Banks  
Rheunte Benson  
Kenneth Cole  
Brian Conner  
Sceva Cummings  
Richard DeSaussure  
Wink Downen  
Adrienne Evans  
Earle Farrell  
Donna Farris  
Debra Fessenden  
Chris Floyd  
Barry Ford  
Christopher Ford  
Casey Freeman  
Colleen Funk  
Robert Gibson  
Jack Green  
Travis Green

Liana Greer  
John Halbert  
James Hamm  
Debra Hammons  
Lorean Hearn  
Randy Hendon  
Terry Holland  
Leonard Hopkins  
Pamela Hymon  
Katina Issac  
James Johnson  
Jennifer Johnson  
Audrey Joy  
Danny Kail  
Srividya Kalidindi  
Camille LeDoux  
Steve Leech  
Mildred McCallister  
Norma McCracken  
Charlene McGhee  
Robert Moore  
Terry Moten  
Anu Naidu  
Praneeth Nangunoori  
John Niven  
Michael O'Donnell  
Bill Oldham  
Anthony Parker  
Carman Quatrone  
Ed Raper  
Mary Ross  
Lalitha Sankaran  
Phyllis Sheppard  
Steve Solass  
Edward Stanton, Jr.  
Terri Stanton  
Linda Stinson  
Raymond Tant  
Kelly Tulley  
Shawna Vanhooks  
Vamsi Vejeria  
Keva Walton  
Shawna Webb  
Helen Wren  
[gsit@shelbycountyttn.gov](mailto:gsit@shelbycountyttn.gov) (general sessions IT email address),  
[service.desk@shelbycounty.gov](mailto:service.desk@shelbycounty.gov)

**From:** Frank Watson

**Sent:** Friday, December 28, 2018 8:18 PM

**To:** Horton, Odell

**Cc:** Craddock, Bob; Trammell, Brad; Will Routt; [MMcLaren@blackmclaw.com](mailto:MMcLaren@blackmclaw.com); Petronio, Beth W.; Whitwell, Lee; [btimmons@blackmclaw.com](mailto:btimmons@blackmclaw.com); [wcochran@blackmclaw.com](mailto:wcochran@blackmclaw.com); Bill Burns; Floyd, Amber; Brown, Byron; Cox, Meghan

**Subject:** Re: Draft PARTIES' JOINT MOTION AND MEMORANDUM REQUESTING APPROVAL OF THE PROPOSED PROTECTIVE ORDER

Dear Odell:

It doesn't look like you read the decision I sent you last week of Howard et al v. Wilkes & McHugh PA et al authored by Magistrate Pham. Had you done so, we could have avoided a skirmish as to a protective order that we otherwise agreed to weeks ago. The Defendants' evolving edits to this, as well as their continual refusal to provide the relevant documents, warrants fees under Rule 37, which we will request at our next hearing on 1/17. Play time is over.

Frank L. Watson, III  
Watson Burns, PLLC  
253 Adams Avenue  
Memphis, Tennessee 38104  
Phone: (901) 529-7996  
Fax: (901) 529-7998  
[www.watsonburns.com](http://www.watsonburns.com)

On Dec 28, 2018, at 2:33 PM, Horton, Odell <[ohorton@wyattfirm.com](mailto:ohorton@wyattfirm.com)> wrote:

All:

Attached is the draft Joint Motion. Just a little wishful thinking.

**Odell Horton Jr.**

Wyatt, Tarrant & Combs, LLP  
6070 Poplar Ave., Suite 300  
Memphis TN 38119-3907  
Direct: (901) 537-1082  
Fax: (901) 537-1010  
Email: [ohorton@wyattfirm.com](mailto:ohorton@wyattfirm.com)

<image001.jpg>

Memphis | Nashville | Louisville | Lexington | New Albany | [www.wyattfirm.com](http://www.wyattfirm.com)

=====

The information contained in this transmission is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. If you are not the intended recipient of this information,

do not review, retransmit, disclose, disseminate, use, or take any action in reliance upon this information. If you received this transmission in error, please contact the sender immediately, destroy all printed copies, and delete the material from all computers.

=====

<61799613-v1-Parties Joint Motion and Memorandum for Protective Order.docx>

- 1983
- Action
- Admin\*
- Adopt
- Alameda
- Amend\*
- Apology
- Appearance
- Approve
- Arraign
- \*Arrest\*
- Attorney
- Authorize\*
- Aware
- Back-up
- Bartel
- Bed
- Bond
- Booking
- Breach
- Break
- broken
- Brophy
- Budget
- Bug
- Bump\*
- Butler
- Cameron
- “case management”
- Cause
- Cell
- Chair
- charge
- Class
- Comfort
- Common
- Compatible
- Compensat\*

- Complain\*
- \*complet\*
- Complicat\*
- Computer
- Concerns
- Condition
- Constitution
- Convict\*
- Cooper
- Correct
- “court management”
- Critical
- Crowd
- Crucial
- Cullison
- Custody
- Custom
- Cycle
- Damn
- Data
- Days
- Debacle
- Defect\*
- Delay
- Demo\*
- Depart
- Depriv\*
- Detain\*
- Detention
- Determin\*
- Dim
- Disaster
- Dismiss
- dispose
- Docket
- Dormitory
- Down
- Duplicate

- Ector
- Error
- Essential
- Example
- Fail\*
- Fault
- Fiasco
- Fix
- Flaw
- Floor
- Flow
- Food
- Format
- Frequent\*
- Fuck
- Function
- Funny
- Future
- Global Tel\*Link
- Golive
- Gross
- \*@gtl.net
- Guard
- Hand
- Harass
- Hell
- Help
- Holding
- Hours
- iCJIS
- Implement\*
- Imprison
- IMS
- Incarcerat\*
- Identical
- Imperative
- Impossible
- Inactive



- Indifference
- Information-technolog\*
- Inhumane
- Inmate
- Intake
- Integrat\*
- Interface
- Investigate
- Issue
- IT
- “jail support specialist”
- “jail population management”
- Jail\*
- Jefferson
- JMS
- Job
- Johnsey
- Joke
- JSS
- JSSI
- Judge
- Jury
- Justif\*
- Kiosk
- Languish
- Lawsuit
- Lawyer
- Legacy
- Liberty
- Lights
- Linger
- Litigation
- Live
- Locat\*
- Long
- Lose
- Lost
- Magnitude

- Major
- Management
- Manual\*
- Merced
- Mess
- Miserable
- Mock
- Money
- Negligen\*
- News
- Notice
- Nugent
- Odessa
- Odyssey
- OMS
- Operat\*
- Organiz\*
- Overcrowd
- Over-detain
- Over-populat\*
- Paramount
- Patch
- Phase
- Policy
- Population
- Post
- Pre-set
- Press
- Prevent
- Price
- Prisoner
- Priority
- Probable
- Problem
- Process
- Program
- \*proper\*
- Protect

- Provider
- Puckett
- rage
- Re-arrest
- Ready
- Release
- Replac\*
- Report\*
- Resolve
- Responsible
- Restore
- Require
- Rights
- “roll out”
- Schedule
- Seizure
- Serious
- Set
- Shit
- Short-sight
- Sierra-cedar
- \*@sierrasystems.com
- Significant
- simulat\*
- sit\*
- Skahan
- sleep\*
- slip
- smooth
- software
- software-AG
- Spence
- Statement-of-work
- Status
- steering-committee
- storm
- stuck
- surprise

- system\*
- terminate
- terrible
- test
- Thompson
- track\*
- train\*
- trouble
- Tyler
- \*@tylertech.com
- Unable
- Unacceptable
- Unbelievable
- Unlawful
- Urgent
- Vendor
- violation
- vital
- wall
- warning
- warrant
- water
- week
- wors\*
- wrong
- Zigler